

# **KING COUNTY LOW-INCOME FARE PROGRAM IMPLEMENTATION TASK FORCE**

## **Final Report and Recommendations**

August 15, 2014



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August 15, 2014

Dow Constantine, King County Executive  
401 Fifth Avenue, Suite 800  
Seattle, WA 98104

King County Council Members  
516 Third Avenue, Room 1200  
Seattle, WA 98104

Dear Executive Constantine and Council Members:

With this letter we are transmitting to you the final report of the Low-Income Fare Program Implementation Task Force.

As requested, we have reviewed and discussed the Low-Income Fare Implementation Plan, with a focus on the Plan's effectiveness in promoting awareness of the low-income fare program to stakeholder communities in King County and the process for establishing eligibility, including a review of potential locations where consumers may seek eligibility to participate in the program.

This report contains our comments on the aspects of the Plan we were asked to focus on, along with some additional suggestions and recommendations to ensure a successful program launch in 2015.

The Task Force believes that the Low-Income Fare program exemplifies King County's emphasis on equity and social justice. When the program is up and running, tens of thousands of people who travel in King County will benefit from reduced fares. Metro's customers who are least able to afford fares will have a low-cost way to travel to work, school, services, and other destinations. This program will make a major contribution to the County's effort to create a more equitable community where everyone can realize their potential.

Task Force members are enthusiastic that this program is just one part of Metro's commitment to continue to improve its products and services, increase ridership, and strengthen its community partnerships.

We thank Metro staff for their responsiveness and support of our efforts throughout the process.

Thank you for the opportunity to serve on the Task Force. We would be happy to serve as a resource in any way we can as you continue with implementation.

Sincerely,

Low-Income Fare Program Implementation Task Force Members

## Background

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In 2012, the King County Council approved a motion to establish an Advisory Committee to support the Council in the investigation and development of new fare program options to assist in meeting the mobility needs of low-income persons as part of the health and human services safety net. In 2013, the Council passed Motion 13968, accepting the Committee's report and recommendations. King County Ordinance 17757 approved the creation of a low-income transit fare program and directed King County Metro to develop an implementation plan to successfully launch the program by March 2015.

The low-income fare would be set at \$1.50 starting in 2015. The fare is flat – the same at all times of day and for one- or two-zone travel. The eligibility threshold for the fare is set at 200 percent of the federal poverty level (see table below).

Ordinance 17757 also created a Low-Income Fare Program Implementation Task Force. The Task Force was directed to submit a report to the Council and the Executive by August 15, 2014 that reviews the Low-Income Fare Program Implementation Plan. Per the ordinance, the report should address:

- The Plan's effectiveness in promoting awareness of the low-income fare program to stakeholder communities in King County.
- The process for establishing eligibility, including a review of potential locations where consumers may seek eligibility to participate in the program.

The ordinance also noted that the report may also include recommendations on modifications to the Plan.

The Task Force met five times between June and August 2014. At the first two meetings, we reviewed and discussed the Implementation Plan. During and between meetings Metro Staff provided answers to Task Force questions, including residency requirements, how to qualify those with no income, and plans for outreach and an evaluation process. Metro Staff in turn asked the Task Force about criteria that should be used to select participating agencies, outreach ideas, and other key program challenges.

### Federal Poverty Guidelines by Household Size

Household Size	100%	200%
1	\$11,670	\$23,340
2	\$15,730	\$31,460
3	\$19,790	\$39,580
4	\$23,850	\$47,700
5	\$27,910	\$55,820
6	\$31,970	\$63,940
7	\$36,030	\$72,060
8	\$40,090	\$80,180

Source: U.S. Health and Human Services Department, 2014

## Plan Comments and Recommendations

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Following some introductory remarks and assumptions, our report comments specifically on the Implementation Plan elements outlined in Ordinance 17757.

### Introduction and Assumptions

The Task Force fully supports a low-income fare program and is committed to helping ensure its successful launch and implementation. We acknowledge that implementation will be a difficult task due to uncertainty about demand and uptake for the program and several inherent tensions. For example, it is important to Task Force members that all applicants are screened for eligibility consistently and do not receive different determinations of eligibility at different agencies. Ensuring this consistency will require clear standards and a uniform list of acceptable ways to verify eligibility.

It is also important to Task Force members that the program be robustly marketed to eligible riders, and that the processes for documenting eligibility, receiving a card, and using the card to ride are as simple as possible. We want Metro to enroll as many eligible applicants as possible, and make the program easy to understand and use, while minimizing the burden on riders, community partner organizations, and Metro staff in terms of documentation. We also acknowledge the need for a clear and reviewable process for documenting and verifying eligibility and issuing replacement cards that does not increase audit risk.

Given the uncertainty and the fact that this is a groundbreaking program – very few large cities have one – the program will undoubtedly need refinements after it is launched to ensure that the right balance is achieved and maintained. We strongly encourage Metro to continue to work with the Implementation Task Force members to review proposed modifications, inform program development, and offer advice and suggestions about priorities for improvements.

We understand that Metro intends to implement the program in partnership with third-party agencies, contracting with non-profits, human services agencies, and other community-based providers for the services they are better equipped to provide. In addition, Metro will partner closely with Public Health – Seattle & King County and its other existing partners to leverage their expertise and relationships. We support this collaborative approach and believe it will strengthen the program.

While there are details that remain to be worked out, successful program implementation from our perspective would include:

- Maximizing the number of eligible riders by making use of a broad marketing campaign, reasonable expectations about income verification documentation, and an easy process for accessing the fare.
- Having provisions in place for consistent, auditable processes *and* reasonable exceptions to policy.
- Verification methods that accommodate people who do not have traditional addresses or identification, or who have substantial barriers to providing documentation of income.
- Check-ins as needed with the Steering Committee, Task Force, participating partners, and program customers to collect and provide feedback (no later than 9 months after implementation).

## Effectiveness in promoting awareness of the low-income fare program to stakeholder communities in King County

The Task Force has reviewed the marketing and outreach section of the Implementation Plan (beginning on page 14) and agrees with the outlined goals and components of the marketing and outreach program. In addition to what is outlined in the Plan, the Task Force offers the following suggestions:

- Before beginning any marketing efforts, develop a name for the program that is short, memorable, and affirming.
- To the extent possible, marketing efforts should include an assessment of likely demand. Several Task Force members and agencies that already distribute ORCA cards could probably assist with this.
- The Task Force agrees that effective outreach to communities with limited English proficiency and individuals who do not currently receive benefits that are tied to income will be challenging. Ideas for reaching these two different populations include:
  - Employ Metro's ORCA To-Go, a mobile sales van that travels around King County making stops at locations to provide full service ORCA card sales and assistance, to do outreach and enrollment events to particular language groups or at specific sites such as public health clinics, libraries, schools, hospitals, or earned income tax credit clinics.
  - Use existing non-profits, translators, travel training, and mobility management programs to spread the word about the program.
  - Partner with existing programs (e.g. Apple Health) and non-profits to send out notices or emails about the program and how to enroll.
  - Ensure that marketing and outreach efforts are designed to communicate broadly with eligible groups (i.e. do not assume that people identify as 'low income' or describe the program as a "government benefit").
- With respect to the January-March 2015 period on the Timeline for marketing and outreach, we recommend beginning program promotion as early as feasible to ensure ample opportunity for people to learn about the program and understand how it works.
- Begin verification at least by February 2015 so that agencies are not overwhelmed when the program launches in March. Applicants could verify income eligibility and be issued a card that would be programmed for use on March 1<sup>st</sup> (or mailed a card by March 1<sup>st</sup>). We believe that issuing cards any earlier than one month in advance could cause confusion and increase the chance of lost cards. However, we also discussed that there may be certain populations where an earlier enrollment is more feasible. All of this should be informed by an assessment of need and demand that should happen as early as possible.

## Potential locations where consumers may seek to demonstrate eligibility

While the ORCA add-value locations are extensive, there are fewer specifics in the Implementation Plan on the locations where consumers will be able to be verified. At this point, Metro is unclear on how many agencies it plans to work with. More agencies should provide more geographic coverage, but this will need to be verified through the RFP process. However, the Task Force presumes that the existing clients of the participating organizations are likely to be the easiest to reach and should be the easiest to serve since they are already receiving benefits that require income verification.

The Task Force discussed that there are at least three different groups of riders and that these groups may need to be served at different locations and with different approaches.

1. Existing agency clients that could probably be served at the agencies from which they receive services.
2. Defined populations that could be served centrally. For example, public housing residents or community college students.
3. Applicants that are not currently receiving services or otherwise connected to a partner agency.

Task Force members representing human services agencies cautioned that most agencies would not be prepared to serve the third category of applicants without additional resources. Thus, the RFP and the need to work with community organizations that serve people at 200% FPL and below.

Our recommendations on this topic are as follows:

- Ensure that the providers selected to verify eligibility and issue cards to their existing client population are spread throughout the regions in the county. For example, on the east side of the county, there should be at least two providers, one in an urban location and one in a rural location.
- In addition to geographic coverage, coverage in terms of hours is critical. Sign up should be available on evenings and weekends and materials with information on locations should include hours of operation.
- Consider a co-location model where a staff member sits at a Department of Social and Health Services Community Service Office, a public health clinic or WIC office, an earned income tax credit clinic, transit center, public or subsidized housing, community college, community or neighborhood center, or other location. ORCA To-Go could be employed onsite at agencies that can verify eligibility but cannot load value onto cards to ensure full service.
- The Task Force supports staffing the King County Metro Sales Offices with a contractor since it is very likely that many people will go there to apply for the program. Once in place, this model should be evaluated to ensure that the strategy is cost effective and meeting objectives and to potentially adapt staffing to demand patterns. Possibly this could involve learning from the San Francisco experience, and staffing the office at certain times of the month.

### Process for establishing eligibility

The Implementation Plan section on verifying eligibility outlines the eligible population and confirms that Metro intends to contract with human services agencies to determine eligibility. During the Task Force process, Metro held a Request for Information meeting with interested agencies to test interest and initial ideas on how this might work. This section of the Plan is less developed than others and King County staff continued to explore options throughout this process. Issues such as how to determine eligibility for those that are not receiving government benefits and have no means to verify income were not able to be resolved by the Task Force in the time available. However, the Task Force offers the following guiding principles:

- Ensure that the bias is towards enrolling more applicants rather than fewer applicants.
- Provide non-traditional ways to verify eligibility for applicants who are not currently receiving public benefits or enrolled in programs that would lead to their income being easily verified through existing databases (such as DSHS Benefits Verification System), or who cannot easily provide documentation of their income eligibility.
- Provide flexibility but also consistency. Applicants should not receive different responses depending on which agency they apply to.

- Do not place undue burden on agencies around deciding gray areas.
- Strive to make the income verification process as seamless as possible by providing opportunities for riders to verify their eligibility, obtain a card, and load value onto a card in one location whenever practical.

Finally, we want to emphasize that this benefit program should be accessible to people that have demonstrated eligibility to a reasonable degree. This program will provide benefits to the individual and also the community due to increased access to jobs, education, and other destinations. The goals of this program are consistent with King County's effort to create a more equitable community; successful implementation of the program will advance equity regionally.

Our comments and recommendations on establishing eligibility are as follows:

- We strongly support making the low-income fare available to all eligible Metro riders regardless of residence, and support the County's decision to not require that applicants live in King County.
- Convene a committee made up of Public Health – Seattle & King County staff and others who have experience helping people sign up for Medicaid, Food Stamps, and other programs that involve income verification to identify workable methods of verification, including methods that will work for people who do not receive public benefits or who have barriers to verifying their income.
- We support having a variety of ways to verify income eligibility and ask that all methods be available to all applicants.
- If an organization offers services or programs that are based on income eligibility, there should be a simple process to document that they have verified eligibility within the last 12 months. Proof of verification would need to be provided, but an additional verification process would not be needed.
- Designate a single point of contact (individual or team) at Metro that an agency can call with questions about eligibility determination.
- Applicants should be able to prove their identity with something other than a current government issued photo identification as this alone will exclude populations.
- The contracts Metro signs with partner agencies should explicitly state that Metro will have responsibility for the Grievance Policy.
- There should be a way for individual cardholders and agencies to load money onto the same card. We acknowledge that the current system with two cards is not a good solution and solving this issue would have a great impact and expand options for cardholders.
  - For people who already receive an ORCA card through a community group (i.e. a card that comes with some value on it, but NOT a low income fare card), Metro staff and community service providers on the Task Force discussed that we should work towards integrating those services. For example, an agency could load \$40 onto an eligible client's low income fare card and the eligible rider could also load money onto the same card rather than having two separate cards to manage.

## Modifications to the Plan

Throughout the process, Metro Staff brought many questions forward to the group along with ideas or issues they were working on. The comments and recommendations below are divided into things that would need to be complete before implementation in March 2015, and comments and recommendations beyond the initial implementation.

### *Comments and recommendations on draft RFP*

At the fourth Task Force meeting, Metro staff presented the draft RFP for community groups to help verify eligibility for the Low-Income Fare and distribute ORCA cards. The Task Force focused comments on what additional information would increase the likelihood that organizations will respond to the RFP (see Appendix A for the comments and recommendations from the meeting, many of which have been incorporated into the final RFP).

We acknowledge that drafting this RFP is uncharted territory. There are many unknowns and uncertainties including program demand and the time it will take to process applicants, among others.

### *Comments and recommendations to address by March 2015*

- Plan budget numbers are at a high level and any revisions to the Plan would benefit from more specific estimates. The RFP process and other implementation elements will help inform the revised budget.
- Create clear rules around use of information and users. For example, applicants should be informed that:
  - Information is used solely for the purpose of establishing eligibility for the Low-Income Fare Program.
  - Information is not shared with U.S. Immigrations and Customs Enforcement.

### *Comments and recommendations to address beyond March 2015*

- Aim to make the renewal process a reaffirmation of existing information rather than a new application.
- Establish an evaluation process for participating agencies.
- Conduct a regular program evaluation to see how well the program is meeting objectives, what challenges have occurred, and what improvements or modifications should be made.

## Low-Income Fare Program Implementation Task Force Members

Name	Affiliation
Rob Beem	North Urban Human Service Alliance
Kathy Brasch	Women's Advisory Board
Alex Clark	Bellevue Community College
Alison Eisinger	Seattle/King County Coalition on Homelessness and Seattle Human Services Coalition
Mahnaz Kourourian Eshetu	Refugee Women's Alliance
Mike Heinisch	South King Council of Human Services
Lynn Moody	Eastside Human Services Forum
Alex Stoller	King County Transit Advisory Commission
Katie Wilson	Transit Riders Union
Dan Wise	Catholic Community Services

## Appendix A: Summary of Comments and Recommendations on Draft RFP – July 30, 2014 Task Force Meeting

Metro Staff presented the draft RFP for Low-Income Fare verification and ORCA Card Distribution to the Task Force. Task Force comments primarily focused on what additional information would increase the likelihood of organizations to respond to the RFP. A summary of the key points is below.

### Budget and Demand

- Members from service organizations noted that the Draft makes no mention of the amount of money available or estimated demand. Without either one of these things (preferably both) it would be difficult for an agency to respond.
- Even a budget range would make it easier for an agency to design a program and submit a budget with certain assumptions.
- Costs associated with verifying eligibility for existing clients will be different from administering the eligibility review for new customers. If an agency is already reviewing someone's documentation and this is just a continuation of that process it would be one cost. If the agency is starting from scratch, it would be more costly. It would be very difficult to estimate how long this would take without more detail about the verification process and necessary documentation and a demand projection.
- An estimate for existing clients could be provided if the RFP outlined the database standards and process and file standards. This additional information would allow an agency to estimate the amount of time each verification is likely to take.
- Several members noted that on a per unit basis they would not respond to staff an office downtown.
- Be flexible around expectations for cost to serve; they will and should vary. For example, small organizations may target specific populations and that may cost more money.

### Creativity and Problem Solving

- The RFP should outline the values behind the initiative – the desire for a fare program that is readily accessible and carries no stigma. These values imply the need and ability to problem solve.
- Make it clear that this RFP is about verifying income, determining eligibility, and issuing cards, but not about loading value onto those cards, though the agency will strive to have some “one stop shop” locations where applicants can be verified, receive a card, and load money onto the card.
- Questions should ask “how *would* you do this?” and not “how *do* you do this?”
- Ask respondents to describe how they might leverage services already provided or connect people to places where they can load the card.
- The RFP should acknowledge that the eligibility criteria (up to 200% of Federal Poverty Level) will allow a lot of people to apply. A map showing the percent below 200% by census tract should be included. If possible, overlay the transit corridors and locations where people can add money to the card.
- Be more specific about who you are trying to reach. The Public Health RFP had specifics around populations and geographies they wanted served.



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